

CLEC access to the Data Warehouse is no later than end of first quarter, 1998."¹⁸⁹ That date came and went without access being provided. As late as May 11th of this year, Mr. Stacy testified before the Tennessee Regulatory Authority that (1) CLEC access to the data warehouse would be phased in over the next two or three months, (2) the only information presently available in the data warehouse related to those measurements BellSouth began tracking in 1997, (3) only the current month's results could be accessed, and (4) access to the underlying raw data would not be available until sometime in the third or fourth quarter of 1998.¹⁹⁰

100. In this proceeding, BellSouth points to an Internet site which it claims "provides CLECs with performance measurement reports and associated data."¹⁹¹ Sometime in late June, BellSouth placed some "raw data" relating to AT&T on its Internet site. However, this "raw data" is fraught with numerous deficiencies. First, BellSouth has not provided the information that is required for AT&T to use the data. The data is provided in a format that is

¹⁸⁹ *Id.*, ¶ 15.

¹⁹⁰ See Stacy Testimony, May 11, 1998, tr. p. 216, *BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996*, Docket No. 97-00309 (Tenn. Reg. Auth.).

¹⁹¹ See BellSouth Brief, p. 65.

confusing and extremely difficult to use. Some essential raw data has not been provided,¹⁹² and key information such as what data is included or excluded from particular calculations has not been made available. As a result of these many problems, AT&T has been unable to reconcile the performance results reported by BellSouth with the raw data found on the Internet site.¹⁹³ Moreover, to date, BellSouth's AT&T Account Team has been unable to respond to AT&T's inquiries regarding the data.

101. Second, the raw data made available to AT&T relates only to BellSouth's performance for AT&T and not to BellSouth's performance for CLECs in the aggregate -- the performance on which BellSouth relies in its application. While BellSouth's performance for AT&T is certainly important to AT&T, it is not the performance on which BellSouth is relying to establish nondiscriminatory performance for CLECs in this case.

102. Third, and perhaps most important in the long run, BellSouth's Internet site does not include -- and BellSouth apparently does not intend ever to include -- any

¹⁹² For example, the data relating to reject intervals contained on the Internet site appear to indicate only the elapsed time for a rejection, rather than the raw data from which that elapsed time would be calculated; namely, the date and time for receipt of the order and the date and time for the rejection notice. Without this raw data, AT&T cannot audit or verify BellSouth's reported reject interval results.

¹⁹³ For example, the raw data on the Internet site indicates a count of 80 non-mechanized orders submitted by AT&T in June and 63 rejections. Yet BellSouth reported that the percentage of non-mechanized AT&T orders rejected in June was less than 16%. Moreover, because the raw data for non-mechanized orders have no purchase order numbers, no telephone numbers, and no order version, it is not possible for AT&T to verify the data.

comparative data regarding BellSouth's performance for its own retail operations on which any determination of parity of performance for CLECs depends. As a result, BellSouth's Internet site does not contain the data that is required to evaluate BellSouth's claims of parity for CLECs in this case.

VIII. CONCLUSION

103. Notwithstanding the Commission's substantial efforts in prior decisions to provide guidance to BellSouth about the performance data that it needs to submit in order to meet its burden of establishing that nondiscriminatory performance is being provided to CLECs, the performance data submitted by BellSouth with its Section 271 application for Louisiana are clearly inadequate. BellSouth has failed to provide several categories of performance data which the Commission has already found to be essential to any determination of parity; it has failed to report essential comparative data regarding its performance for itself; and the performance data which BellSouth has submitted with its application does not show that parity of performance is presently being provided to CLECs. In addition, BellSouth has not presented its performance measurement information to the Commission in ways that would permit the Commission accurately to compare BellSouth's performance for CLECs with its performance for itself. BellSouth's Section 271 application for Louisiana should therefore be denied.

FCC DOCKET CC NO. 98-121

AFFIDAVIT OF C. MICHAEL PFAU AND KATHERINE M. DAILEY

VERIFICATION

I hereby verify, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and belief.

C. Michael Pfau

Subscribed and sworn to before me
this ____ day of July, 1998

Notary Public

FCC DOCKET CC NO. 98-121

AFFIDAVIT OF C. MICHAEL PFAU AND KATHERINE M. DAILEY

VERIFICATION

I hereby verify, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and belief.

Katherine M. Dailey

Subscribed and sworn to before me
this ____ day of July, 1998

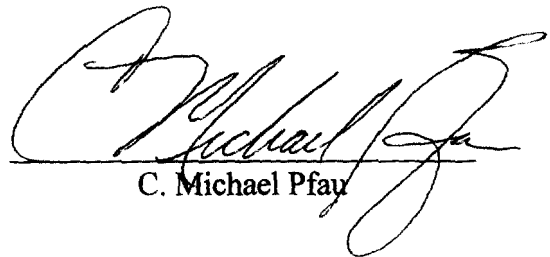
Notary Public

FCC DOCKET CC NO. 98-121

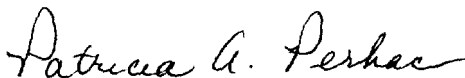
AFFIDAVIT OF C. MICHAEL PFAU AND KATHERINE M. DAILEY

VERIFICATION

I hereby verify, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and belief.


C. Michael Pfau

Subscribed and sworn to before me
this 23rd day of July 1998


Notary Public

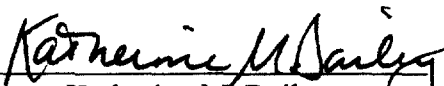
PATRICIA A. PERHAC
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 4/8/2002

FCC DOCKET CC NO. 98-121

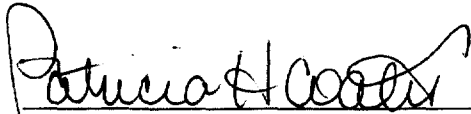
AFFIDAVIT OF C. MICHAEL PFAU AND KATHERINE M. DAILEY

VERIFICATION

I hereby verify, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and belief.


Katherine M. Dailey

Subscribed and sworn to before me
this 23rd day of July 1998


Notary Public

ATTACHMENT 1

Before the
Georgia Public Service Commission
Atlanta, Georgia

In the Matter of:

BellSouth Telecommunications, Inc.'s)
Statement of Generally Available Terms)
and Conditions under Section 252(f) of)
the Telecommunications Act of 1996.)

Docket No. 7253-U

**AFFIDAVIT OF WILLIAM N. STACY
PERFORMANCE MEASUREMENTS**

MAY 22, 1998

William N. Stacy, being duly sworn, deposes and says:

I. PROFESSIONAL EXPERIENCE

1. My name is William N. Stacy. I am employed by BellSouth Telecommunications, Inc. ("BellSouth"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am the Assistant Vice President - Services for the Interconnection Operations department of BellSouth Telecommunications, Inc. (BST). In this position, I am responsible for development of the procedures used by BST personnel to process Competitive Local Exchange Carrier (CLEC) service requests, and for assisting the service centers in Interconnection Operations in

implementing CLEC contracts in a manner consistent with State Commission and Federal Communications Commission ("FCC") rules and regulations governing local exchange competition.

2. BellSouth has developed an enhanced set of performance measurements, which are referred to as the BellSouth Service Quality Measurements. The BellSouth Service Quality Measurements, which were updated to reflect the Georgia Public Service Commission's May 6, 1998 Order in docket 7892-U, were filed with the Commission on May 8, 1998.
3. Exhibit WNSPM-1, attached, is the Georgia specific set of reports associated with the BellSouth Service Quality Measurements for the February 1998, March 1998, and April 1998 report months. These reports demonstrate that BellSouth is providing nondiscriminatory access to CLECs in Georgia.
4. BellSouth also has filed with the Commission monthly surveillance reports reflecting the performance measurements that were previously included as part of BellSouth's revised Statement of Generally Available Terms and Conditions that the Commission allowed to go into effect in January 1998. These reports, which reflect performance for the report months of January 1998, February 1998, March 1998, and April 1998, are attached as

BellSouth Service Quality Measurements

Report for

April

Provisioning

REPORT: PERCENT PROVISIONING ORDER ACCURACY ¹
REPORT PERIOD: 04/01/1998 - 04/30/1998

	MECHANIZED			NON MECHANIZED		
	# OF ORDERS REVIEWED	# OF ERRORS	% ORDER ACCURACY	# OF ORDERS REVIEWED	# OF ERRORS	% ORDER ACCURACY
CLEC 1						
GEORGIA						
REGION						
CLEC AGGREGATE						
GEORGIA						
REGION	21	1	95.24%	280	46	83.57%
BST RESIDENCE						
GEORGIA						
REGION	162	5	96.91%			

Note 1: Statistical sample for CLECs utilized LSRs submitted across the 9 state region.

Statistical sample for BST Retail utilized order population from across the 9 state region, not re-created on a monthly basis.

ATTACHMENT 2

Fred McCallum Jr.
General Counsel - Georgia

BellSouth Telecommunications, Inc.
Legal Department - Suite 376
25 Perimeter Center West
Atlanta Georgia 30346
Telephone 770-391-2416
Facsimile 770-391-2912

May 21, 1998

Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, Room 520
Atlanta, GA 30334

**Re: Performance Measurements for Telecommunications Interconnection,
and Unbundling and Resale; Docket No. 7892-U**

**Re: Consideration of BellSouth Telecommunications, Inc.'s Services
Pursuant to Section 271 of the Telecommunications Act of 1996;
Docket No. 7253-U**

Dear Sir/Madam:

Enclosed please find the original and ten copies of BellSouth Telecommunications, Inc.'s April Performance Measurement data. This data is submitted pursuant to the Commission's order of January 15, 1998 in Docket 7253-U and includes a summary of the resale performance data in order to make it easier to compare results of BellSouth with CLECs.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed self-addressed and stamped envelope. Thank you for your assistance in this regard.

Sincerely,


Fred McCallum Jr.

FMJ/lmh

Enclosures

cc: David Burgess
Dennis Sewell
John McLaughlin
Tiane L. Sommer
Parties of Record

FSD MD30
DATE 04/30/98.120
TIME 03:08

CHDS DAILY TICKET DELAY ANALYSIS

FORM MP-4750-C
RETAIN OPT
HQ1 CDC
PAGE 0001

JOB=MD30A01 JOB15978 JOBSTEP=MD30A01 PROCSTEP=S100 PROGRAM=MD30A019 (COMPILED: 08/11/94 11.13.59)

INTRA-COMPANY													
SUMMARY OF TICKETS INVOICED 04/01 TO 04/15													
ELAPSED CALENDAR DAYS	-01-	-02-	-03-	-04-	-05-	-06-	-07-	-08-	-09-	10-29	OVR 29	TOTAL	REVENUE
RAO: ATLANTA													
INTRA COMPANY TICKET	2048	492	529	7	18	58	1	11	58	3	0	3225	\$3,709.00
INTRA COMPANY INDEX	63.5X	78.8X	95.2X	95.4X	95.9X	97.7X	97.8X	98.1X	99.9X	100.0X	100.0X	100.0X	
RAO: CHARLOTTE													
INTRA COMPANY TICKET	27903	6228	5358	773	31	1	1	5	3	6	0	40309	\$33,415.00
INTRA COMPANY INDEX	69.2X	84.7X	98.0X	99.9X	100.0X	100.0X	100.0X	100.0X	100.0X	100.0X	100.0X	100.0X	
RAO: MIAMI													
INTRA COMPANY TICKET	1142	199	309	4	1	6	55	74	37	142	0	1969	\$1,913.00
INTRA COMPANY INDEX	58.0X	68.1X	83.8X	84.0X	84.1X	84.4X	87.2X	90.9X	92.8X	100.0X	100.0X	100.0X	
RAO: JACKSONVILLE													
INTRA COMPANY TICKET	12736	2536	2819	27	0	3	1	1	3	6	0	18132	\$27,876.00
INTRA COMPANY INDEX	70.2X	84.2X	99.8X	99.9X	99.9X	99.9X	99.9X	100.0X	100.0X	100.0X	100.0X	100.0X	
RAO: MACON													
INTRA COMPANY TICKET	28289	5928	6830	261	32	5	14	14	9	105	1	41488	\$20,632.00
INTRA COMPANY INDEX	68.2X	82.5X	98.9X	99.6X	99.6X	99.7X	99.7X	99.7X	99.7X	100.0X	100.0X	100.0X	
RAO: FT. LAUDERDALE													
INTRA COMPANY TICKET	854	721	280	292	24	0	0	0	0	74	1	2246	\$2,255.00
INTRA COMPANY INDEX	38.0X	70.1X	82.6X	95.6X	96.7X	96.7X	96.7X	96.7X	96.7X	100.0X	100.0X	100.0X	
RAO: COLUMBIA													
INTRA COMPANY TICKET	30896	17462	9250	5527	813	2	0	0	0	6	0	63956	\$83,105.00
INTRA COMPANY INDEX	48.3X	75.6X	90.1X	98.7X	100.0X	100.0X	100.0X	100.0X	100.0X	100.0X	100.0X	100.0X	
RAO: RAO TOTALS													
INTRA COMPANY TICKET	103868	33566	25375	6891	919	75	72	105	110	342	2	171325	\$172,905.00
INTRA COMPANY INDEX	60.6X	80.2X	95.0X	99.1X	99.6X	99.6X	99.7X	99.7X	99.8X	100.0X	100.0X	100.0X	

ATTACHMENT 3

Appropriate Levels of Disaggregation For BellSouth Performance Measurements

Product Disaggregation								
Resale		Unbundled Network Elements					Interconnection	
POTS	Specials	Loops	Ports		Transport	Combinations	Collocation	Trunks
			Line	Trunk				
Residence	Voice Grade Private Line	8db Analog	Analog	PRI	Dedicated DS0	Loop+Port+Transport	Physical	Common
Business	Digital DS0 Private Line	2-wire digital	BRI	DID	Dedicated DS1	DS1 loop + office multiplexing	Virtual	Dedicated
Centrex/ Centrex-like	DS1	4-wire digital	DS1	Message	Dedicated DS3			
Analog PBX trunks	DS3	ASDL			Dedicated >DS3			
DID trunks	Above DS3	HDSL						
ISDN BRI ¹		xDSL						
ISDN PRI ¹								

Note 1. If treated as a designed service, the product detail may be more appropriately reflected within the "Resale Specials" category.

**Appropriate Levels of Disaggregation
For BellSouth Performance Measurements**

Activity Disaggregation						
Pre-Ordering (Data Exchange)	Ordering	Provisioning	Maintenance & Repair		Billing	
			(Data Exchange)	Tasks	Usage	Invoices
Address Verification	New Installation	Outside Dispatch	Trouble Entry	Outside Dispatch – No Service	End User	Resale
Telephone Number Requests	Change of Service Features	Central Office Work (Frame or Equipment)	Trouble Status	Outside Dispatch – Degraded Service	Access	Unbundled Network Elements
Customer Account Information Requests	Disconnection	Software Only Work	Test Results	Central Office Work – No Service	Alternately Billed	Interconnection
Service/Product/Facility Availability ¹	Inside Move	Disconnect	Trouble Cancellation	Central Office Work – Degraded Service		
Appointment/Due Date Scheduling ¹	Outside Move	Administrative	Rejection/Error	No Access to Premises or No Trouble Found		
Rejections/Errors	LSP-LSP Conversion without changes	No Access		Administrative		
	LSP-LSP Conversion with changes					
	Record Change Only					
	Standalone Directory Listing (DL)					

Note 1. If transactions are differentiated, then performance should be separately tracked

**Appropriate Levels of Disaggregation
For BellSouth Performance Measurements**

Activity Disaggregation (Continued)						
Pre-Ordering	Ordering	Provisioning	Maintenance & Repair		Billing	
			Queries	Tasks	Usage	Invoices
	Standalone Directory Assistance Listing (DA)					
	Standalone DL + DA					
	Other Orders					

N

— 22 —

1

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

**Second Application by BellSouth
Corporation, BellSouth Telecommunications,
Inc., and BellSouth Long Distance, Inc., for
Provision of In-Region, InterLATA Services
in Louisiana**

CC Docket No. 98-121

**AFFIDAVIT

OF

JORDAN RODERICK

ON BEHALF OF

AT&T CORP.

AT&T EXHIBIT N**

Filed August 4, 1998

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Second Application by BellSouth)	
Corporation,)	CC Docket
BellSouth Telecommunications, Inc., and)	No. 98-121
BellSouth Long Distance, Inc. for)	
Provision of In-region, InterLATA)	
Services in Louisiana)	

**AFFIDAVIT
OF
JORDAN RODERICK
ON BEHALF OF AT&T CORP.**

Introduction

1. My name is Jordan Roderick. My business address is 5000 Carillon Point, Kirkland, Washington 98033. I am executive vice president, wireless products, at AT&T Wireless Services, Inc. In that capacity, I have overall responsibility for messaging and data operations, product development, information systems, wireless terminal equipment and partnership operations.

2. In my position, I have become intimately familiar with the characteristics of PCS communications systems, as well as with the substitutability in the marketplace of wireless products for customers' current wireline local service.

3. The purpose of my affidavit is to establish that, as currently offered and priced in the marketplace, PCS is not a competitive substitute for wireline local exchange service for all but a tiny fraction of users. I submitted a similar affidavit on November, 25, 1997 in connection with BellSouth's first application for in-region, interLATA authority in Louisiana. In denying that application on February 4, 1998, the Commission noted its recent conclusion that PCS providers "are currently positioned to offer products that largely complement, rather than substitute for, wireline local exchange."¹ There have been no material changes in the marketplace in the ensuing few months.

4. As these products are currently offered in the marketplace today, there is no difference at all from the perspective of the end user between service marketed under the name "PCS" and service marketed under the name "digital cellular." Each of these services provides the user with exactly the same package of features and functionalities, including mobility, capability for high-speed handoff, paging and the full panoply of vertical features such as call waiting. For example, AT&T Wireless customers use dual-band phones that are capable of receiving and transmitting over both "cellular" and "PCS" frequencies. Thus, as an AT&T consumer travels around the country using his or her wireless phone, the consumer would have no way of knowing whether any particular call is being transmitted between the phone and the

¹ Memorandum Opinion and Order, ¶ 73 n.261 Application by BellSouth Corp. Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Louisiana, CC Docket No. 97-231 (released February 4, 1998) (internal quotation omitted).

FCC DOCKET CC NO. 98-121
AFFIDAVIT OF JORDAN RODERICK

wireless network over the cellular or PCS frequency -- nor would the customer have any reason to care, as the quality of transmission and the features and functions available to the consumer would in no way depend on the frequency being utilized. PCS as deployed today is simply cellular service transmitted over a different part of the spectrum.²

5. PCS and cellular services are thus substitute products that compete against each other in the marketplace. PCS today is not a substitute, however, for wireline local exchange services.

6. Although wireless service has made tremendous improvements in recent years in terms of quality and reliability, these factors remain uneven as wireless networks continue to be built out. In addition, certain features of wireless service make it unattractive to most consumers as a replacement for their existing wireline service. Its very mobility limits the attractiveness of PCS service, for example, for multi-resident households. For instance, if one member of the family wishes to have the PCS phone while driving to work at night, the remaining members of the household would lose their ability to make or receive calls until that family member returns home. And, even while home, the family would have to purchase additional and

² The functional equivalence of PCS and digital cellular service is vividly demonstrated by AT&T's own marketing experience. AT&T Wireless provides digital services around the country, using either cellular or PCS frequencies, depending on the particular geographic location. In order to avoid needlessly confusing consumers, those services are marketed under the combined name "Digital PCS," regardless of the actual frequency used for transmission.

FCC DOCKET CC NO. 98-121
AFFIDAVIT OF JORDAN RODERICK

expensive equipment to permit use of multiple extensions feeding off that one PCS phone number.

7. For these reasons, the percentage of wireless users who choose wireless service as a substitute for their basic wireline service is so small as not even to constitute a material market segment.

8. To be sure, it is very much AT&T's hope and expectation that at some point in the future, as technology develops, digital wireless service will become an attractive substitute for wireline local exchange service for a wide array of customers. Indeed, AT&T is investing hundreds of millions of dollars in an effort to develop such technology and make its wireless services -- both fixed and mobile -- an attractive widespread competitive alternative to traditional wireline service.

9. Today, however, only a small number of users with idiosyncratic characteristics (e.g., highly mobile businesspersons and singles who make a sufficiently high number of calls to qualify for the lowest available discount plans and who make relatively few calls from home) use their PCS phones as a substitute for wireline service. As BellSouth points out in its application, AT&T Wireless's advertisements encourage such users to "make your wireless